

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES INVESTOR PROTECTION :
CORPORATION, :
: Plaintiff-Applicant, : Adv. Pro. No. 08-01789 (BRL)
: - against - : SIPA LIQUIDATION
: BERNARD L. MADOFF INVESTMENT : (Substantively Consolidated)
: SECURITIES LLC, :
: Defendant. :
:----- x
In re: :
: BERNARD L. MADOFF, :
: Debtor. :
:----- x
IRVING H. PICARD, :
: Plaintiff, :
: - against - : Adv. Pro. No. 10-05287 (BRL)
: SAUL B. KATZ, et al. :
: Defendants. :
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NOTICE OF MOTION TO COMPEL TURNOVER OF DISCOVERY

PLEASE TAKE NOTICE that the Sterling Defendants, by their undersigned counsel, will move before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at the United States Bankruptcy Court, One Bowling Green, New York, NY 10004, on February 22, 2011, at 10:00 a.m. or as soon thereafter as counsel may be heard, for an Order pursuant to Bankruptcy Rules 2004, 7026(d)(1) and 7037(a)(1) compelling the Trustee to provide to the Sterling Defendants all information related to the complaint filed against the Sterling Defendants on December 7, 2010.

Dated: New York, New York
February 14, 2011

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